

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

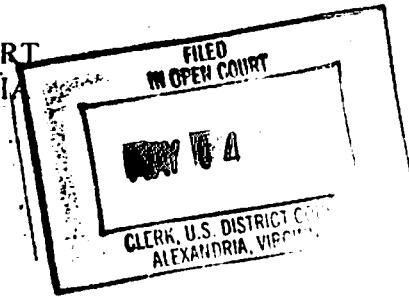
UNITED STATES OF AMERICA)

v.)

HENOCK GHILE,)

"Knots,")

Defendant.)



Case No. 1:12cr182

STATEMENT OF FACTS

The United States and the defendant, Henock Ghile, agree that had this matter proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. The Underground Gangster Crips (UGC) is a criminal street gang based in Fairfax County, Virginia. UGC members and associates were responsible for sex trafficking of juveniles and adults, in and affecting interstate commerce.
2. The defendant, Henock Ghile, was a UGC gang associate.
3. Between in and around May 2011 and in and around September 2011, Ghile transported S.S., a 17 year-old, for the purpose of engaging in commercial sex acts.
4. Between in and around May 2011 and in and around September 2011, Ghile transported A.B., a 17 year-old, for the purpose of engaging in commercial sex acts.
5. The defendant had a reasonable opportunity to observe the persons he transported.
6. The defendant separated himself from the organization in or about the beginning of 2012.
7. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact

known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

8. The actions of the defendant as recounted above were in all respects knowing and deliberate, and were not committed by accident, mistake, or other innocent reason.

Respectfully submitted,

Neil H. MacBride
United States Attorney

By:


Marc J. Birnbaum
Special Assistant United States Attorney


Inayat Delawala
Assistant United States Attorney

Defendant's Stipulation and Signature: After consulting with my attorney and pursuant to the plea agreement I entered into this day with the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

Date: 5/11/2012



Henock Ghile
Defendant

Defense Counsel's Signature: I have carefully reviewed the above statement of facts with my client, Henock Ghile. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 5/11/2012



Andrea Moseley
Counsel for the Defendant